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### REMARKS

Claims 14-36 were pending at the time of examination. No claims were allowed. Claims 20 and 32 are objected to as being of improper dependent form for failing to further limit the subject matter of the previous claim. Claims 14-36 stand rejected under 35 USC 103 (a) as being unpatentable over U.S. Patent No. 6,009,436, to Motoyama et al ("Motoyama") in view of UK Patent Application, GB 2 307 571 to Takasawa et al ("Takasawa").

Attached is a marked-up version of the changes being made by this amendment. Claims 14, 20, 22, 25, 28, 32 and 34 are amended by this response. No new matter has been added. Claims 19 and 31 are cancelled by this response to overcome the objections to claims 20 and 32. The applicant respectfully requests reconsideration in view of the amended claims and these remarks.

#### **I. The § 103 Rejections**

The Examiner rejected claims 14-36 under 35 USC 103 (a) as being allegedly unpatentable over Motoyama in view of Takasawa. Applicants disagree with this rejection because Motoyama and Takasawa fail to disclose or suggest, alone or in combination, at least the use of identified common patterns to map elements in a first document to equivalent elements in a second document, where at least one of the elements or sub-elements in the first source document is mapped to an element or sub-element of a different element type in the second source document based on the identified common patterns, which all of remaining claims 14-18, 20-30 and 32-36 require.

Claim 14 recites a computer executable method of converting a format of a first source document to a format of a second source document. The method includes identifying patterns common to the first and second source documents and using the identified common patterns to map elements and sub-elements in the first source document to equivalent elements and sub-elements in the second source document, where at least one of the elements or sub-elements in the first source document is mapped to an element or sub-element of a different element type in the second source document based on the identified common patterns.

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Motoyama discloses a method "for mapping a first structured information format to a second structured information format." Abstract. Motoyama's method requires user interaction as an input to map a SGML document to a HTML document. See, e.g., Figs. 4, 5, 6A, 12B and 12C. The Examiner admits that Motoyama does not disclose identifying patterns that are common to two source documents. Thus, Motoyama cannot disclose or suggest using such common patterns to map elements from one document to elements of another document where at least one of the elements or sub-elements in the first source document is mapped to an element or sub-element of a different element type in the second source document based on the identified common patterns.

Takasawa also fails to disclose or suggest using identified common patterns to map elements and sub-elements in the first source document to equivalent elements and sub-elements in the second source document where at least one of the elements or sub-elements in the first source document is mapped to an element or sub-element of a different element type in the second source document based on the identified common patterns. Takasawa generates a document type definition ("DTD") for SGML based on a plurality of sample documents. Abstract. Takasawa's method creates a structure list to generate the DTD. Page 19, lines 12-16. If a sample document includes an element that is different from elements in other documents, the element is identified as a new element and added to the structure list (pages 13-14). Accordingly, in Takasawa such elements are not identified as part of a common pattern between the documents or mapped to an element in another document.

The applicant respectfully submits that the proposed combination of Motoyama and Takasawa would not result in the invention as claimed. Neither Motoyama nor Takasawa disclose or suggest mapping elements between two document using common identified patterns where at least one of the elements or sub-elements in the first source document is mapped to an element or sub-element of a different element type in the second source document based on the identified common patterns. Because Motoyama and Takasawa, alone and in combination, fail to disclose or suggest at least one limitation of claim 14, the applicant respectfully submits that no *prima facie* showing of obviousness has been made. Thus, claim 14 and its dependent claims 15-18 20-21, and 37 are allowable over the proposed combination of Motoyama and Takasawa.

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Claim 21 is a dependent claim based on claim 14, and is allowable for at least the following additional reason. Claim 21 recites that the identified common patterns are used to automatically map elements and sub-elements in the first source document to equivalent elements and sub-elements in the second source document. This additional limitation is neither disclosed nor suggested by the cited combination of references.

The Examiner points out that Motoyama recites that "processing systems are known in which a data processor converts a document encoded in a markup language automatically to another format," (Col. 2, lines 42-44). But while this passage may disclose the general idea of automatically converting markup language documents into different formats, the passage does not disclose or suggest a method that includes identifying patterns that are common between a first and the second document and using the identified common patterns to map elements in the first document to elements in the second document. Nor does Motoyama suggest any motivation to combine such systems with its methods; rather, Motoyama teaches away from such systems by affirmatively distinguishing its methods from the known automatic systems, stating that "this [prior art] software does not allow the user to interactively define the mapping of SGML tags to another format." Thus, it would not have been obvious to one of ordinary skill in the art to use the software Motoyama discusses in the background with the techniques disclosed in Motoyama since Motoyama discloses that "the present invention is designed to provide a user with a graphic tool to transform documents written in a cryptic source SGML format into another target structure format." Col. 3, lines 39-43. A method can not both automatically convert a document format and, at the same time, allow a user "to interactively select options for transformation," as recited in col. 3, lines 63-64 of Motoyama. Since Takasawa does not disclose or teach mapping using common identified patterns where at least one of the elements or sub-elements in the first source document is mapped to an element or sub-element of a different element type in the second source document based on the identified common patterns, Takasawa also does not disclose or teach performing this step automatically. Neither Takasawa nor Motoyama, either alone or in combination, disclose or suggest using identified common patterns to map automatically elements and sub-elements in the first source document to equivalent elements and sub-elements in the second source document where at least one of the elements or sub-elements in the first source document is mapped to an element or sub-element of a different element type

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in the second source document based on the identified common patterns. For this additional reason, claim 21 is allowable over the proposed combination of Motoyama and Takasawa.

Claim 22 recites a computer implemented method of converting the format of a source document to the format of a set of source documents. The method includes identifying patterns common to a source document and a set of source documents, and using the identified common patterns to map elements and sub-elements in the common pattern of the source document to equivalent elements and sub-elements in the common pattern of the set of source documents, where at least one of the elements or sub-elements in the source document is mapped to an element or sub-element of a different element type in the set of source documents based on the identified common patterns. As discussed above, however, neither Motoyama nor Takasawa, either alone or in combination, discloses or suggests using identified common patterns to map elements and sub-elements, where at least one of the elements or sub-elements in the source document is mapped to an element or sub-element of a different element type in the set of source documents based on the identified common patterns. Accordingly, claim 22 and its dependent claims 23, 24 and 38 are allowable over Motoyama and Takasawa for at least the reasons discussed above in connection with claim 14.

Claim 25 recites a computer program including instructions to perform the method recited in claim 14, and claim 34 recites a computer program including instructions to perform the method recited in claim 22. Thus, claims 25 and 34, and their dependent claims 26-27, 29-30, 32, 33, 35-36 and 39-40, are allowable over the combination of Motoyama and Takasawa.

Claim 28 recites a computer system including "a computer processor configured by a mapping program to identify patterns common to the source document and the set of source documents and map elements and sub-elements in the common pattern of the source document to equivalent elements and sub-elements the common pattern of the set of source documents, at least one of the elements or sub-elements in the source document being mapped to an element or sub-element of a different element type in the set of source documents based on the identified common patterns." As discussed above with reference to claim 22, the combination of Motoyama and Takasawa fails to disclose or suggest identifying patterns common to the source document and the set of source documents and map elements and sub-elements in the common pattern of the source document to equivalent elements and sub-elements the common pattern of

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the set of source documents, at least one of the elements or sub-elements in the source document being mapped to an element or sub-element of a different element type in the set of source documents based on the identified common patterns. Thus, the combination of Motoyama and Takasawa does not disclose or suggest a computer system including a computer processor configured by a mapping program to perform this operation. Therefore, claim 28 is allowable over the combination of Motoyama and Takasawa.